

February 3, 2022

VIA ECF

Honorable Brian M. Cogan
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Matthew Grimes, No. 1:21-cr-00371 (BMC)

Dear Judge Cogan:

On behalf of defendant Matthew Grimes in the above-referenced case, we respectfully write to inform you that in reviewing Mr. Grimes' Motion to Dismiss the Indictment (Dkt. 71), we realized that certain footnotes were somehow deleted from the final brief during the conversion from Microsoft Word to PDF process. Specifically:

- Footnote 13 on p. 15, which should have stated: *Oversight of the Foreign Agents Registration Act and Attempts to Influence U.S. Elections: Lessons Learned from Current and Prior Administrations*, Questions for the Record for the Honorable Michael Horowitz Submitted August 3, 2017 at 2, <https://www.judiciary.senate.gov/imo/media/doc/Horowitz%20Responses%20to%20QFRs.pdf> [hereinafter "Horowitz QFR"]; and
- What should have been footnote 16 on p. 24, following Senator Grassley's quote at the top of the page, which should have stated: *Hearing on Oversight of the Foreign Agents Registration Act and Attempts to Influence U.S. Elections: Lessons Learned from Current and Prior Administrations Before the S. Comm. on the Judiciary* (July 26, 2017) (statement of Sen. Chuck Grassley, Chairman, S. Comm. on the Judiciary), <https://www.judiciary.senate.gov/grassley-statement-at-hearing-on-enforcement-of-the-foreign-agents-registration-act>.

We wanted to point out these inadvertent omissions right away to avoid any confusion. We apologize sincerely for any confusion this may have caused. We are also looking into the process by which documents are reviewed and converted to prevent this from occurring again.

Respectfully,

/s/ Abbe David Lowell

Abbe David Lowell
WINSTON & STRAWN LLP
1901 L Street, N.W.
Washington, D.C. 20036
D: +1 202-282-5875
F: +1 202-282-5100
ADLowell@winston.com

Attorney for Defendant Matthew Grimes

cc: All counsel of record (via ECF)